

US DISTRICT COURT
WESTERN DIST ARKANSAS
FILED
IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION
MAR 18 2016

DOUGLAS F. YOUNG, Clerk
By Deputy Clerk
PLAINTIFFS

ALVIN BAILEY AND IFE BAILEY

v.

Case No. 16-5068 TJB

**ADA MAYE JONES DIPPEL, CRST
EXPEDITED, INC. AND CRST INTERNATIONAL,
INC., JOHN DOE 1 AND JOHN DOE 2**

DEFENDANTS

NOTICE OF REMOVAL

Please take notice that the captioned case filed as Case No. 72CV-16-494-5 in the Circuit Court of Washington County, Arkansas has been hereby removed to the United States District Court for the Western District of Arkansas, Fayetteville Division. The Defendants file this Notice of Removal and state, as grounds for removal, the following:

1. This action was commenced by the filing of a Summons and Complaint in the Circuit Court of Washington County, Arkansas on March 7, 2016, and was assigned case number 72CV-16-494-5. A copy of the Complaint and pleadings currently on file with the Washington County, Arkansas, Circuit Court are attached as Exhibit "A" to the Notice of Removal.

2. Plaintiffs Alvin Bailey and Ife Bailey have alleged in their Complaint that they are residents of St. Petersburg, Pinellas County, Florida. (Exhibit "A," Complaint.)

3. Defendants CRST Expedited, Inc. and/or CRST International, Inc. are corporations which are neither incorporated in nor have their principal places of business in the State of Arkansas. Defendant Ada Maye Jones Dippel is, upon information and belief, a citizen and resident of the State of California.

4. This is a civil action in which plaintiff seeks compensatory in an amount in excess of that required for federal diversity jurisdiction. (Exhibit "A", Complaint.)

5. Therefore, this action is one over which a federal district court has original jurisdiction because there is complete diversity of citizenship between the parties pursuant to 28 U.S.C. § 1332, and this case is removable under 28 U.S.C. § 1441(a) under the procedures set forth in 28 U.S.C. § 1446.

6. Defendant has given written notice of this removal by filing copies of this Notice of Removal with the Circuit Clerk of Washington County, Arkansas, and by mailing copies of this Notice of Removal to Plaintiff's attorney.

7. No admission of fact, law or liability is intended by the filing of this notice, and all defenses, motions and pleas are expressly reserved.

WHEREFORE, Defendants give notice that this case has been removed from the Circuit Court of Washington County, Arkansas, to the United States District Court for the Western District of Arkansas, Fayetteville Division.

Respectfully submitted,

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BY: 

KARA B. MIKLES, BAR NO. 2003088

CERTIFICATE OF SERVICE

I, Kara B. Mikles, state that on this 17th day of March, 2016, a true and correct copy of the foregoing pleading was mailed to:

James M. Lloyd
Lloyd Law Firm
100 W. Center Street
Fayetteville, Arkansas 72702



KARA B. MIKLES